## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

Master File No. 1:23-21060-CIV-WILLIAMS

In re INDEPENDENT LIVING SYSTEMS	) <u>CLASS ACTION</u>
DATA BREACH LITIGATION	)
	_)
This Document Relates To:	)
ALL ACTIONS.	)
	)

## JOINT MOTION FOR ENTRY OF STIPULATED HIPAA QUALIFIED PROTECTIVE ORDER

The Parties hereby respectfully request that the Court enter the Stipulated HIPAA Qualified Protective Order attached hereto as **Exhibit A**. The Stipulated HIPAA Qualified Protective Order was jointly drafted by and agreed to by the Parties.

Dated: June 24, 2024 Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP STUART A. DAVIDSON Florida Bar No. 84824

s/ Stuart A. Davidson

STUART A. DAVIDSON

225 NE Mizner Boulevard, Suite 720 Boca Raton, FL 33432 Telephone: 561/750-3000 561/750-3364 (fax) sdavidson@rgrdlaw.com MORGAN & MORGAN JOHN A. YANCHUNIS Florida Bar No. 324681 201 N. Franklin Street, 7th Floor Tampa, FL 33602 Telephone: 813/223-5505 jyanchunis@ForThePeople.com

MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC ALEXANDRA M. HONEYCUTT# 800 S. Gay Street, Suite 1100 Knoxville, TN 37929 Telephone: 866/252-0878 ahoneycutt@milberg.com

Plaintiffs' Co-Lead Counsel

BILZIN SUMBERG
MICHAEL A. HANZMAN
Florida Bar No. 510637
1450 Brickell Avenue, 23rd Floor
Miami, FL 33131
Telephone: 305/350-2424
305/351-2253 (fax)
mhanzman@bilzin.com

Plaintiffs' Liaison Counsel

NUSSBAUM LAW GROUP, P.C. LINDA P. NUSSBAUM<sup>#</sup> 1211 Avenue of the Americas, 40th Floor New York, NY 10036 Telephone: 917-438-9189 lnussbaum@nussbaumpc.com

LYNCH CARPENTER LLP PAIGE T. NOAH# 1133 Penn Avenue, Floor 5 Pittsburgh, PA 15222 Telephone: 412/322-9243 412/231-0246 (fax) paigen@lcllp.com GEORGE FELDMAN McDONALD, PLLC BRITTANY L. BROWN Florida Bar No. 105071 9897 Lake Worth Road, Suite 302 Lake Worth, FL 33467 Telephone: 561/232-6002 BBrown@4-justice.com

HAUSFELD LLP STEVEN M. NATHAN<sup>#</sup> 888 16th Street N.W., Suite 300 Washington, DC 20006 Telephone: 202/540-7200 202/540 7201 (fax) snathan@hausfeld.com

Members of Plaintiffs' Executive Committee

ROBBINS GELLER RUDMAN & DOWD LLP
ALEXANDER C. COHEN
Florida Bar No. 1002715
225 NE Mizner Boulevard, Suite 720
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
acohen@rgrdlaw.com

STUEVE SIEGEL HANSON LLP JORDAN A. KANE# 460 Nichols Road Kansas City, MO 64112 Telephone: 816/714-7100 kane@stuevesiegel.com

KOPELOWITZ OSTROW FERGUSON WEISELBERG GILBERT STEVEN SUKERT Florida Bar No. 1022912 1 West Las Olas Boulevard, 5th Floor Fort Lauderdale, FL 33301 Telephone: 954/525-4100 954/525-4300 (fax) sukert@kolawyers.com

LEVIN SEDRAN & BERMAN NICHOLAS J. ELIA# 510 Walnut Street, Suite 500 Philadelphia, PA 19106-3697 Telephone: 877/882-1011 215/592-4663 (fax) NElia@lfsblaw.com

ZIMMERMAN REED LLP MICHAEL J. LAIRD# 1100 IDS Center 80 South 8th Street Minneapolis, MN 55402 Telephone: 612/341-0400 michael.laird@zimmreed.com

AYLSTOCK, WITKIN, KREIS & OVERHOLTZ, PLLC MAURY GOLDSTEIN Florida Bar No. 1035936 17 East Main Street, Suite 200 Pensacola, FL 32502 Telephone: 844/794-7402 mgolstein@awkolaw.com

BRADLEY/GROMBACHER LLP FERNANDO VALLE\* 313 Oak Crest Drive, Suite 240 Westlake Village, CA 91361 Telephone: 805/270-7100 fvalle@bradleygrombacher.com

Members of Plaintiffs' Leadership Development Committee

<sup>#</sup> Pro hac vice granted

<sup>\*</sup> Pro hac vice forthcoming

## s/Brian M. Ercole

Brian M. Ercole
Florida Bar No. 102189
brian.ercole@morganlewis.com
Melissa M. Coates
Florida Bar No. 111420
melissa.coates@morganlewis.com
Morgan, Lewis & Bockius LLP
600 Brickell Avenue
Suite 1600
Miami, Florida 33131-3075
Telephone: 305.415.3000

Facsimile: 305.415.3001

Gregory T. Parks (admitted pro hac vice) gregory.parks@morganlewis.com
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
Telephone: 215.963.5000

Telephone: 215.963.5000 Facsimile: 215.963.5001

Counsel for Defendant Independent Living Systems, LLC